

RACHAEL SWERNOFSKY

Nevada Bar No. 15465

QUILLING SELANDER LOWNDS

WINSLETT & MOSER, P.C.

6900 N. Dallas Parkway, Suite 800

Plano, Texas 75024

(214) 560-5443

(214) 871-2111 Fax

rswnofsky@qslwm.com

Counsel for Trans Union LLC

****Designated Attorney for Personal Service****

Kurt Bonds, Esq.

Nevada Bar No.: 6228

6605 Grand Montecito Parkway, Suite 200

Las Vegas, Nevada 89149

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

SHAWN WALKER,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC, EXPERIAN INFORMATION
SOLUTIONS, INC., TRANS UNION, LLC,
ALLY FINANCIAL, INC., CAPITAL ONE
SERVICES, LLC, 1ST UNITED CREDIT
UNION, BANK OF AMERICA, N.A.,
CARMAX AUTO SUPERSTORES, INC.,
JPMORGAN CHASE BANK, N.A.,
CORELOGIC CREDCO, LLC, and TD AUTO
FINANCE, LLC,

Defendants.

Case No. 2:22-cv-01338-RFB-VCF

**UNOPPOSED MOTION AND ORDER
EXTENDING DEFENDANT TRANS
UNION LLC'S TIME TO FILE AN
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

Defendant Trans Union LLC ("Trans Union"), by and through its counsel, files this Unopposed Motion Extending Defendant Trans Union's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.

On August 17, 2022, Plaintiff filed his Complaint in this Court against Trans Union alleging claims pursuant to the Fair Credit Reporting Act ("FCRA"), 15 § 1681, *et seq.* The current deadline for Trans Union to answer or otherwise respond to Plaintiff's Complaint is September 9, 2022.

1 Plaintiff has agreed to extend the deadline in which Trans Union has to answer or
2 otherwise respond to Plaintiff's Complaint up to and including October 11, 2022. This is the
3 first motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

4 Trans Union requires additional time to locate and assemble the documents relating to
5 Plaintiffs' allegations, any disputes submitted to Trans Union, and Trans Union's investigation of
6 any such disputes. Trans Union's counsel will then need additional time to review the
7 documents and respond to the allegations in Plaintiff's Complaint. Additionally, Plaintiff and
8 Trans Union are actively engaged in case-resolution negotiations and are optimistic about
9 resolving this case entirely. This Motion is made in good faith and not for the purposes of delay.

10
11 Dated this 9th day of September 2022.

12 **QUILLING SELANDER LOWNDS**
13 **WINSLETT & MOSER, P.C.**

14 */s/ Rachael Swernofsky*

15 **RACHAEL SWERNOFSKY**

16 Nevada Bar No. 15465

17 6900 N. Dallas Parkway, Suite 800

18 Plano, TX 75024

19 (214) 560-5443

20 (214) 871-2111 Fax

21 rsuernofsky@qslwm.com

22 ***Counsel for Trans Union LLC***

ORDER

The Unopposed Motion for Extension of Time for Trans Union LLC to file an answer or otherwise respond to Plaintiff's Complaint is so ORDERED AND ADJUDGED.

Dated this 19th day of September 2022.



UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of September 2022, I electronically filed **UNOPPOSED MOTION AND ORDER EXTENDING DEFENDANT TRANS UNION LLC'S TIME TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of the Court using the CM/ECF system which will then send a notification of such to the following counsel of record:

George Haines
ghaines@freedomlegalteam.com
Gerardo Avalos
gavalos@freedomlegalteam.com
Freedom Law Firm
8985 S. Eastern Avenue, Suite 350
Las Vegas, NV 89123
(702) 880-5554
(702) 385-5518 Fax
and
Michael Kind
mk@kindlaw.com
Kind Law
8860 S. Maryland Parkway, Suite 106
Las Vegas, NV 89123
(702) 337-2322
(702) 329-5881 Fax
Counsel for Plaintiff

Gia Marina
gmarina@clarkhill.com
Clark Hill
3800 Howard Hughes Parkway, Suite 500
Las Vegas, NV 89169
(702) 862-8300
(702) 862-8400 Fax
Counsel for Equifax Information Services, LLC

Brody R. Wight
brody.wight@troutman.com
Troutman Pepper Hamilton Sanders, LLP
600 Peachtree Street, NE, Suite 3000
Atlanta, GA 30308
(470) 832-5562
Counsel for Ally Financial, Inc.

Jamie Lynn Keeton
jlkeeton@sandsattorneys.com
Schlichter & Showack, LLP
2381 Rosecrans Ave., Ste. 326
EL Segundo, CA 90245-4917
(310) 643-0111
(310) 643-1638 Fax
Counsel for CarMax Auto Superstores, Inc.

/s/ Rachael Swernofsky

RACHAEL SWERNOFSKY